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12
13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **SAN FRANCISCO DIVISION**

16
17 IN RE PG&E CORPORATION
SECURITIES LITIGATION

Case No. 3:18-cv-03509-RS

18 **STIPULATION AND ~~PROPOSED~~ ORDER**
19 **TO VACATE CASE MANAGEMENT**
20 **CONFERENCE AND RELATED**
21 **DEADLINES**

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Hon. Richard Seeborg

1 **WHEREAS**, on June 15, 2018, the Court set a Case Management Conference (CMC) for
2 September 20, 2018;

3 **WHEREAS**, on August 28, 2018, the CMC was continued to September 27, 2018;

4 **WHEREAS**, on September 10, 2018, the Court appointed Public Employees Retirement
5 Association of New Mexico (“PERA”) as lead plaintiff, and vacated the hearing set for
6 September 27, 2018;

7 **WHEREAS**, on September 14, 2018, the CMC was continued to January 10, 2019;

8 **WHEREAS**, on December 14, 2018, PERA filed a Second Amended Consolidated Class
9 Action Complaint (“SAC”);

10 **WHEREAS**, the SAC asserts claims under the federal securities laws that are subject to
11 the procedural requirements of the Private Securities Litigation Reform Act of 1995 (the
12 “PSLRA”), including those set forth in 15 U.S.C. § 78u-4;

13 **WHEREAS**, Defendants intend to file a motion to dismiss, which triggers a stay of
14 discovery under the PSLRA;

15 **WHEREAS**, Defendants’ deadline to respond to the SAC is February 15, 2019;

16 **WHEREAS**, the parties have conferred and agreed that it is in the interests of the parties
17 and judicial efficiency to continue the CMC and vacate all related deadlines; and

18 **WHEREAS**, this Stipulation and Order is without prejudice to, or waiver of, any rights,
19 arguments, or defenses otherwise available to the parties to this action.

20 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, subject to the
21 approval of the Court, that the January 10, 2019 CMC and related deadlines shall be vacated.
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1 Dated: December 20, 2018

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~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

12/21/18
Date



Hon. Richard Seeborg
United States District Judge

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ATTESTATION

I am the ECF User whose identification and password are being used to file the foregoing Stipulation. Pursuant to Local Rule 5-1(i)(3) regarding signatures, I, Robert W. Perrin, attest that concurrence in the filing of this document has been obtained.

Dated: December 20, 2018

LATHAM & WATKINS LLP

By /s/ Robert W. Perrin
ROBERT W. PERRIN

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